

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BENSLEY CONSTRUCTION, INC., on its own behalf and on behalf of all others similarly situated,	)
Plaintiff	)
v.	)
MARSH & MCLENNAN COMPANIES, INC.,	)
MARSH, INC., ACE USA, ACE INA, AMERICAN	)
INTERNATIONAL GROUP, AMERICAN	)
REINSURANCE COMPANY, ARTHUR J.	)
GALLAGHER & CO., HILB ROGAL & HOBBS,	)
COMPANY, WILLIS GROUP HOLDINGS, LTD.,	)
WILLIS NORTH AMERICA INC., WILLIS GROUP	)
LTD., UNIVERSAL LIFE RESOURCES,	)
UNIVERSAL LIFE RESOURCES, INC. (d/b/a ULR	)
INSURANCE SERVICES, INC.), THE CHUBB	)
CORPORATION, USI HOLDINGS, INC., METLIFE,	)
INC., PRUDENTIAL FINANCIAL, INC.,	)
UNUMPROVIDENT CORPORATION, THE ST.	)
PAUL TRAVELERS COMPANIES, INC., ZURICH	)
AMERICAN INSURANCE COMPANY, LIBERTY	)
MUTUAL GROUP INC., LIBERTY MUTUAL	)
INSURANCE COMPANY, LIBERTY MUTUAL	)
FIRE INSURANCE COMPANY, EMPLOYERS	)
INSURANCE COMPANY OF WAUSAU, and ST.	)
JAMES INSURANCE COMPANY LTD.,	)
Defendants.	)

Civil Action No.  
05-11249 GAO

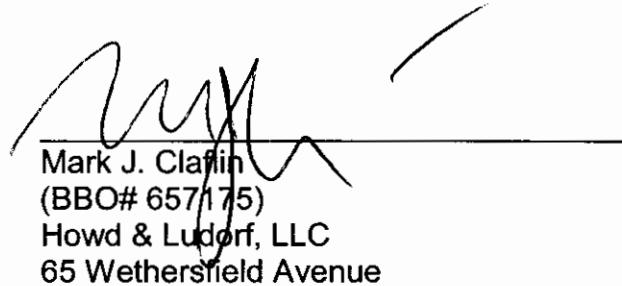
**CORPORATE DISCLOSURE STATEMENT OF DEFENDANT, "ACE USA"**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Local Rule 7.3, and subject to any objections to personal jurisdiction or insufficiency of service of process or any Rule 12(b) motions that Defendant ACE USA may file in this case, Defendant ACE USA states that ACE USA is a non-entity. ACE USA is a marketing identifier and refers to the ACE Group of Companies' U.S. and Canadian business

operations – a business division of the ACE Group of Companies. ACE USA has no parent company or any publicly held corporation that owns 10% or more of ACE USA.

ACE USA

By its Attorneys



Mark J. Clafin  
(BBO# 657175)  
Howd & Ludorf, LLC  
65 Wethersfield Avenue  
Hartford, CT 06114-1190  
(860) 249-1361  
(860) 249-7665 (Fax)  
E-mail: [mclaflin@hl-law.com](mailto:mclaflin@hl-law.com)

Dated: July 21, 2005

**CERTIFICATE OF SERVICE**

I, Mark J. Claflin, hereby certify that a copy of the above document was served upon the following counsel of record by U.S. Mail, postage prepaid, this 21<sup>st</sup> day of July, 2005:

Kenneth G. Gilman, Esquire  
 Douglas J. Hoffman, Esquire  
 Gilman & Pastor, LLC  
 60 State Street, 37<sup>th</sup> Floor  
 Boston, MA 02109

Daniel S. Savrin, Esquire  
 Joshua Vitullo, Esquire  
 Bingham, McCutchen LLP  
 150 Federal Street  
 Boston, MA 02110

Mitchell J. Auslander, Esquire  
 John R. Oller, Esquire  
 Christopher J. St. Jeanos, Esquire  
 Kristin Branson, Esquire  
 Wilkie Farr & Gallagher LLP  
 787 Seventh Avenue  
 New York, NY 10019-6099

H. Lee Godfrey, Esquire  
 Neal S. Manne, Esquire  
 Johnny W. Carter, Esquire  
 Jeffrey R. Seely, Esquire  
 Susman Godfrey LLP  
 1000 Louisiana St., Ste. 5100  
 Houston, TX 77002

Bruce W. Edmands, Esquire  
 Eckert Seamans Cherin & Mellott, LLC  
 One International Place  
 Boston, MA 02110

Brien T. O'Connor, Esquire  
 Timothy J. Casey, Esquire  
 Ropes & Gray LLP  
 One International Place  
 Boston, MA 02110

Roberta A. Kaplan, Esquire  
 Paul, Weiss, Rifkind, Wharton &  
 Garrison LLP  
 1285 Avenue of the Americas  
 New York, NY 10019-664

John F. Collins, Esquire  
 Molly Lehr, Esquire  
 Kristin Ann Meister  
 Dewey Ballantine LLP  
 1301 Avenue of the Americas  
 New York, NY 10019

Edwin M. Larkin, Esquire  
 Lina M. Viviano, Esquire  
 200 Park Avenue  
 New York, NY 10166-4193

Terry M. Grimm, Esquire  
 Stephen C. Schulte, Esquire  
 Winston & Strawn LLP  
 35 West Wacker Drive  
 Chicago, IL 60601

Julianne Balliro, Esquire  
 Perkins Smith & Cohen LLP  
 One Beacon Street, 30th Floor  
 Boston, MA 02108-3106

James V. Masella III, Esquire  
 Richard C. Pepperman, Esquire  
 Anastasia A. Angelova, Esquire  
 Sullivan & Cromwell LLP  
 125 Broad Street  
 New York, NY 10004-2498

David Gabianelli, Esquire  
Ray L. Wong, Esquire  
Ned M. Gelhaar, Esquire  
Hancock Rothert and Bunshoft LLP  
Four Embarcadero Center, Ste. 300  
San Francisco, CA 94111

John A.D. Gilmore, Esquire  
DLA Piper Rudnick Gray Cary US LLP  
One International Place, 21st Floor  
Boston, MA 02110-2600

Ralph T. LePore, III, Esquire  
James M. Tierney, Esquire  
Holland & Knight LLP  
10 St. James Avenue  
Boston, MA 02116

Ian Crawford, Esquire  
Todd & Weld, LLP  
28 State Street, 31st Floor  
Boston, MA 02109

James W. Carbin, Esquire  
Eric Breslin, Esquire  
Duane Morris LLP  
744 Broad Street  
Newark, NJ 07102

John R. Middleton, Jr., Esquire  
Lowenstein Sandler pc  
65 Livingston Avenue  
Roseland, NJ 07068

Deborah E. Hryb, Esquire  
Patrick W. Shea, Esquire  
Paul, Hastings, Janofsky & Walker LLP  
1055 Washington Blvd., 9th Floor  
Stamford, CT 06901

Laura Besvinick, Esquire  
Hogan & Hartson LLP  
Mellon Financial Center  
1111 Brickell Avenue, Suite 1900  
Miami, FL 33131

Ingrid Hlawaty, Esquire  
Edwin M. Larkin, Esquire  
Lina M. Viviano, Esquire  
Winston & Strawn LLP  
200 Park Avenue  
New York, NY 10166-4193

Robert H. Pees, Esquire  
Vadim Sarma, Esquire  
Akin Gump Strauss Hauer & Feld LLP  
590 Madison Avenue  
New York, NY 10022-2524

Daniel B. Winslow, Esquire  
Patricia R. Rich, Esquire  
Duane Morris LLP  
470 Atlantic Avenue, Suite 500  
Boston, MA 02210

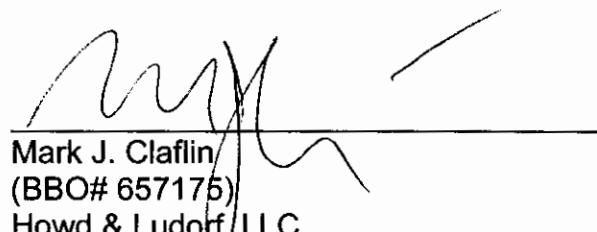
Barry Y. Weiner, Esquire  
Maureen Mulligan, Esquire  
Ruberto Israel & Weiner, P.C.  
100 North Washington Street  
Boston, MA 02114

Joseph Hamilton, Esquire  
Mirick, O'Connell, DeMaillie &  
Lougee, LPP  
100 Front Street  
Worcester, MA 01608-1477

David H. LaRocca, Esquire  
Michael J. Garvey, Esquire  
Paul C. Curnin, Esquire  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, NY 10017

Paula M. Bagger, Esquire  
Cooke Clancy & Gruenthal, LLP  
265 Franklin Street  
Boston, MA 02110

Douglas M. Brooks, Esquire  
Martland & Brooks LLP  
Stonehill Corporate Center, Suite 500  
999 Broadway  
Saugus, MA 01906



Mark J. Claflin  
(BBO# 657175)  
Howd & Ludorf, LLC  
65 Wethersfield Avenue  
Hartford, CT 06114-1190  
(860) 249-1361  
(860) 249-7665 (Fax)  
E-mail: [mclaflin@hl-law.com](mailto:mclaflin@hl-law.com)